

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

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Roy Romer
Governor

Thomas M. Vernon, M.D.
Executive Director

July 13, 1990

Mr. Robert M Nelson, Jr., Manager
Department of Energy
Rocky Flats Area Office
P.O. Box 928
Golden, CO 80402-0928

Mr. Phil Warner, Rocky Flats Plant Manager
EG&G
Rocky Flats Plant
P.O. Box 464
Golden, CO 80402-0464

RE: Surface Water Interim Measures/Interim Remedial Action
Plan/Environmental Assessment and Decision Document 903 Pad, Mound,
and East Trenches Areas OU 2. 12 June 1990 Draft

Dear Messrs. Nelson and Warner,

The Colorado Department of Health, Hazardous Materials Waste Management Division, ("The Division"), has completed review of the above document. Our comments are provided in the attachment.

The Surface Water Interim Measures/Interim Remedial Action OU 2 contains deficiencies which must be addressed if the intended objective of preventing contaminants in surface water from spreading is to be attained. The collection system presented fails to collect most of the contaminated waters of OU2. Also, the information provided on the surface water treatment system does not permit a positive conclusion as to whether or not contaminants will be removed.

An additional concern is that the schedules must be revised to show field activities beginning no sooner than ten days after release of the responsiveness summary.

In the commendable interest of saving time, DOE has assembled in one document sections to fulfill its obligations to both the IAG and NEPA. Lost in the combined document is the quantitative rationale usually present necessary to make scientifically sound judgments. For this reason "The Division" recommends NEPA documentation not be included in documents written to fill IAG and CERCLA requirements.

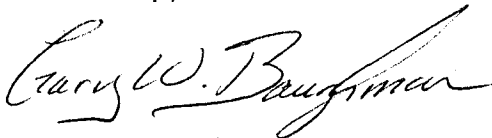
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We appreciate the efforts of Scott Grace to answer preliminary questions about the seeps at Upper South Walnut Creek by bringing sixteen photographs to CDH on Monday, July 9, 1990.

If you have any questions regarding our comments, please call Noreen Matsuura at (303) 331-4920.

Sincerely,



Gary W. Baughman
Unit Leader
Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Patricia Corbetta, EPA
Martin Hestmark, EPA
Scott Grace, DOE
Tom Olsen, DOE
Dan Miller, AGO
Joan Sowinski, CDH
Tom Greengard, EG&G

Enc.
GB/NM/nm